

Thomas Zimpleman (pro hac vice pending)
Jacqueline Iwata (pro hac vice pending)
Natural Resources Defense Council
1152 15th St. NW Ste. 300
Washington, DC 20005
Phone: (202) 289-6868
tzimpleman@nrdc.org
jiwata@nrdc.org

Joel Reynolds (pro hac vice pending)
Natural Resources Defense Council
1314 2nd St.
Santa Monica, CA 90401
(310) 434-2300
jreynolds@nrdc.org

Attorneys for Movant Intervenor-Defendant Natural Resources Defense Council

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

NORTHERN DYNASTY
MINERALS LTD. and PEBBLE
LIMITED PARTNERSHIP,

Case No. 3:24-cv-00059-SLG

Plaintiffs,

v.

U.S. ENVIRONMENTAL
PROTECTION AGENCY

Defendant.

DECLARATION OF KONRAD SCHAAD

I, KONRAD SCHAAD, state and declare as follows:

1. I am a member of the Natural Resources Defense Council (NRDC).

2. I live in Homer, Alaska and am a commercial sockeye salmon fisher in Bristol Bay. I started fishing in 1985 and purchased my own commercial permit and boat in 1992. My two sons have fished with me since they were ten years old, and both operate their own boats now, also in Bristol Bay.

3. I spend each fishing season in the Bristol Bay area. The sockeye salmon fishery starts around early June and ends in late July or early August. Each year, I generally start getting the boat ready in late May or early June and stay until I pull the boat out of the water at the very end of July. I plan to return for this year's fishing season.

4. The potential impacts of Pebble Mine are far reaching and severe. The mine site is smack in the middle of the most productive salmon-spawning grounds in the world. Because the ground water table in this area is extremely shallow, any ground-level contamination from the mine would likely damage the watershed, and might even migrate to other rivers. Heavy metals from the mine that would leach into the groundwater could harm the salmon fry as well as mess with the returning adult salmon, confusing their homing instincts.

5. I am concerned that the plans for the mine do not account for possible failures, especially given that the proposed mine site is in a very earthquake-prone area.

All the water coming out of the tailings lake has to be treated for the duration of its existence; forever. It is ludicrous to claim that we can build a mine of such magnitude and store its tailings safely for perpetuity.

6. In addition to the possibility of a dam failure and subsequent spill of toxins into the Mulchatna and Nushagak rivers, or leakage into the groundwater, I am worried about the consequences of construction in the area. Operating the proposed mine would require building new roads and gas- and powerlines through sensitive salmon spawning habitat and areas with the highest concentrations of brown bears in the world.

7. Wild salmon runs naturally fluctuate quite a bit. If you throw in manmade disruptions to these runs and disturb the spawning grounds, you pull the rug out from under the entire salmon population. Any damage to the rivers in the area would be irreversible and would devastate the overall production of Bristol Bay. Failure of salmon runs of one or two river systems would harm me and thousands of fishermen economically.

8. Even without a spill, building the mine would negatively impact our salmon industry. We get better prices for salmon from Bristol Bay because they are caught in pristine and wild rivers. If we introduce mining to this area, people will likely no longer trust that our salmon is wild and clean, and the value of our salmon could diminish.

9. Aside from the economic loss, the destruction of the last great, wild salmon run would be a great emotional loss for people who depend on salmon and care about a

balanced ecosystem. There are thousands of examples in the world, where development killed off natural fish runs. I'm not aware of any open pit mine in the middle of perfect salmon habitat that did not have a huge adverse effect on the fish and all the wildlife and people that depend on them. If we mess this one up, we do not have another one to go to.

10. The proposed mine also has concerning implications for people who live in Homer. The proposed megaproject will depend on the Kenai Peninsula's infrastructure and will require gas- and powerlines across the Cook Inlet. The ore concentrates from the mine will have to be barged out of Cook Inlet or Shelikof Straight and will require a huge loading facility. This will impact people who fish scallops, groundfish, salmon or lead bear and wildlife tours from Homer. While these impacts may not affect me directly, they threaten my surrounding community and the ecosystem as a whole.

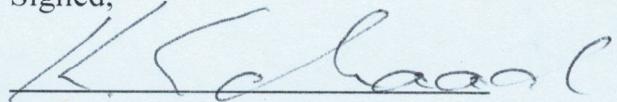
11. The salmon are the heartbeat for all the villages that sit in the Bristol Bay watershed. They all depend on this renewable resource economically and emotionally. The loss of these opportunities would lead to immeasurable hardships for our fellow Alaskans who live there.

12. I support the Environmental Protection Agency's decision to veto Pebble Mine. If the State of Alaska were to succeed in their lawsuit trying to strike down EPA's veto, my ability to continue my decades-long occupation in salmon fishing would be diminished.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: 3-19-2024

Signed,



KONRAD SCHAAD

Northern Dynasty Minerals Ltd. v. U.S. EPA,
Case No. 3:24-cv-00059-JMK

5